

**UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS**

**Criminal Number  
No. 05-10059-DPW**

**UNITED STATES OF AMERICA**

**VS.**

**CHAD BENJAMIN**

**DEFENDANT'S ASSENTED TO MOTION FOR EXTENSION OF  
TIME FOR FILING OF SUPPLEMENTAL FILINGS RELATIVE TO  
DEFENDANT'S MOTION TO SUPPRESS AND TO RESCHEDULE  
THE FURTHER HEARING PRESENTLY SCHEDULED FOR  
JUNE 9, 2006**

Now comes the defendant, Chad Benjamin, in the above numbered indictment, through counsel, and hereby moves this Court for an order extending the time for the filing of supplemental filings relative to the defendant's Motion to Suppress for a period of thirty (30) days and to reschedule the hearing on this matter presently scheduled for June 9, 2006 to a date after July 24, 2006.

In support of the within motion counsel for the defendant says that the completed transcripts of the Motion to Suppress hearing have been received as of April 24, 2006. Since that time counsel has been engaged and on trial and will be starting a multiple gang rape trial in New Bedford Superior Court on May 4<sup>th</sup> which will run up through and including the date set for

filings of supplemental pleadings. Counsel has been ordered to appear in Barnstable Superior Court on the matter of Commonwealth vs. Jared Bickford upon completion of the rape trial in New Bedford Superior Court per order of Hon. Gary Nickerson and is scheduled to begin the first degree murder trial of Commonwealth vs. Abode Ahiahornu in Suffolk Superior Court on May 17<sup>th</sup>.

Due to the press of present trial commitments counsel for the defendant is therefore requesting that this Court extend for thirty (30) days up through and including June 14, 2006 the deadline for the filing of supplemental pleadings and to reschedule the hearing on this matter from June 9, 2006 to a date after July 24, 2006 as Assistant U.S. Attorney Antoinette Leoney will be on vacation from June 25, 2006 through July 5, 2006 and counsel for the defendant will be on vacation from July 10, 2006 through July 23, 2006..

Counsel has contacted Assistant U.S. Attorney Antoinette Leoney and received her assent to this motion with the understanding that counsel agrees to exclude this time under the Speedy Trial Act.

Chad Benjamin,  
By his attorney

/s/Kevin J. Reddington